

EXHIBIT 1

From: [MCCALLUM, Robert](#)
To: [Zeke DeRose](#)
Cc: [EWALT, Andrew \(AJE\)](#); [HENDERSON, Andrew](#); [Lauren Kaplin](#); [VACA, Lauren](#); [Daniel Bitton](#); [dpearl@axinn.com](#); [geraldine.young@nortonrosefulbright.com](#); [Peter M. Hillegas](#); [Yetter, Paul](#); [Bracewell, Mollie](#); [Syed, Ayla](#)
Subject: RE: Data transfer proposal

[Zeke,](#)

As discussed on our meet and confers yesterday and today, we wanted to get Plaintiffs' reactions to the proposal below. We plan to put this on the agenda for discussion with the Special Master next week.

Kind regards,
Rob

From: MCCALLUM, Robert
Sent: Monday, April 1, 2024 11:13 PM
To: Zeke DeRose <Zeke.DeRose@LanierLawFirm.com>
Cc: EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>; HENDERSON, Andrew <Andrew.Henderson@freshfields.com>; KAPLIN, Lauren <lauren.kaplin@freshfields.com>; VACA, Lauren <Lauren.VACA@freshfields.com>; Daniel Bitton <dbitton@axinn.com>; dpearl@axinn.com; geraldine.young@nortonrosefulbright.com; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>
Subject: Data transfer proposal

Zeke,

With expert discovery on the horizon, I write to propose that the parties agree to use Microsoft's Azure Data Share service ("Azure") to transfer the materials described in paragraphs 4.1.1 to 4.1.6 of the Stipulation and Order Regarding Expert Discovery, ECF No. 184 ("expert backup materials"). EDVA Plaintiffs and Google used Azure to transfer expert backup materials in the EDVA case, and the process worked very smoothly for everyone. More information about Azure is available at <https://learn.microsoft.com/en-us/azure/data-share/>.

Specifically, we propose that:

1. At least seven (7) business days before the production of expert backup materials, the receiving party will send the producing party a list of email addresses to which the producing party will make expert backup materials available (the "recipient addresses"). The recipient addresses should have the necessary permissions to receive and administer Azure data shares.
2. At least four (4) business days before the production of expert backup materials, the producing party will send to each of the recipient addresses an Azure invitation for each data share where the receiving party will be able to access expert backup materials upon production. The Azure invitations will be used to establish trust with the recipient addresses.
3. Each data share will provide no more than 250,000 files totaling no more than 100 TB.
4. For file collections used in distributed computing environments (e.g., Big Query, Spark, Snowflake), no individual file will be larger than 2 GB. For file collections processed in non-distributed environments (e.g., Stata, SAS, Python), individual files may exceed this cap.
5. After all expert backup materials are made available, the producing party will notify the receiving party that the expert backup materials are accessible and will provide the precise number of files and number of bytes contained within each data share.

6. Each expert report will be sent as an email attachment. If an expert report is too large to be transferred via email, it may be transferred via Azure or FTP.
7. Nothing in this agreement would affect the deadlines for service of expert reports and expert backup materials.

We hope to discuss this proposal during our next meet-and-confer.

Kind regards,
Rob

Rob McCallum
Of Counsel

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